

ECKERT SEAMANS CHERIN & MELLOTT, LLC

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Attorneys for EL at Jackson, LLC

IN THE MATTER OF THE
APPLICATION OF THE TOWNSHIP OF
JACKSON

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
DOCKET NO.: OCN-L-822-92
OCN-L-1879-15

**CERTIFICATION OF MITCHELL
NEWMAN IN SUPPORT OF MOTION TO
ENFORCE LITIGANT'S RIGHTS**

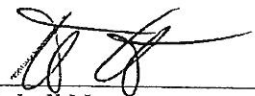
I, Mitchell Newman, of full age, do hereby certify as follows:

1. I am currently the Director of Acquisition and Entitlements for the Tri-State Division of U.S. Home Corporation (d/b/a Lennar). EL at Jackson, LLC is a joint venture of Lennar at Jackson, LLC, a subsidiary of Lennar, and M&M at Jackson, LLC.
2. At all relevant times, particularly during mediation in the above-captioned matter, I was the Senior Vice President of Venture Operations with Lennar. As such, I am fully familiar with the facts set forth herein.
3. Mediation occurred on at least six (6) dates in this matter: (1) July 11, 2016; (2) July 27, 2016; (3) August 4, 2016; (4) August 8, 2016; (5) August 26, 2016; and (6) November 1, 2016. I attended all of the above mediation sessions on behalf of Lennar/EL at Jackson, LLC.
4. At the majority of the mediation sessions, Township representatives expressed the Township's desire to limit the number of bedrooms and reduce the size of the clubhouse

or clubhouse rooms, or preferably eliminate the clubhouse entirely, within EL's proposed non-age restricted development.

5. The Sarlo Act, also known as the Conversion Act, was never discussed at any of the mediation sessions.
6. At the third mediation session on August 4, 2016, Township representatives articulated the rationale for bedroom restrictions and the elimination of or reduction in size of the clubhouse – preventing and inhibiting Jewish people from Lakewood Township (commonly referred to as Orthodox) from moving into the EL site.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By: 
Mitchell Newman

Dated: March 6, 2016

ECKERT SEAMANS CHERIN & MELLOTT, LLC

Victoria D. Britton, Esq. (NJ Attorney ID No. 026672006)

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	:	OCN-L-1879-15
	:	
	:	
	:	
	:	CERTIFICATION OF FACSIMILE
	:	SIGNATURE PURSUANT TO RULE 1:4-4(c)
	:	
	:	
	:	

I, Victoria D. Britton, Esq., of full age, do hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey, and an associate of the law firm of Eckert Seamans Cherin & Mellott, LLC, counsel to Intervenor, EL at Jackson, LLC. As such, I am fully familiar with the facts contained herein and authorized to make this certification.

2. Mitchell Newman acknowledged, to me, the genuineness of the facsimile signature that appears on his Certification in Support of EL at Jackson, LLC's Motion to Enforce Litigant's Rights dated March 6, 2017, which is submitted in the above-captioned matter.

3. A copy of his original signature will be filed if requested by the Court or a party to this action.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 6, 2017


Victoria D. Britton